

REMARKS

Claims 87-98 are presented for consideration, with Claims 87, 92, 93 and 98 being independent.

Initially, Applicants note with appreciation that the rejections of the claims under 35 U.S.C. §112, first paragraph and second paragraph, have been withdrawn.

Claims 87-89, 92-95 and 98 stand rejected under 35 U.S.C. §102(e) as allegedly being anticipated by Bonomi '191. In addition, Claims 90, 91, 96 and 97 stand rejected under 35 U.S.C. §103 as allegedly being obvious over Bonomi in view of Nguyen '437. These rejections are respectfully traversed.

In response to these rejections, Applicants respectfully wish to revisit the issue of whether Bonomi qualifies as prior art. As previously discussed, Applicants' Japanese priority document 6-010083 (JP '083), was filed on January 31, 1994, and thus predates Bonomi. In the Office Action mailed December 31, 2001, it was asserted that the JP '083 priority document fails to provide adequate support for Applicants' claimed invention, and in particular the "inter-picture" coding feature of the claims (see pages 6 and 7 of Office Action).

It is respectfully submitted, however, that the claims have been subsequently amended and no longer recite the first and second encoding steps of performing inter-picture coding. In Claim 87, for example, intra-picture coding is performed in the first and second encoding steps to the moving image data. Moreover, although Claim 87 still recites inputting image data using intra-picture coding and inter-picture coding, such encoding methods, per se, are known in the art, and the disclosure of "inter-picture" coding in, for example, paragraphs 8 and 41 of the JP '083 priority document is more than sufficient to meet the requirements of 35 U.S.C. §112. The fact that the second Japanese priority document, i.e., Japanese priority

document 7-007389 (which does not predate Bonomi) may provide more disclosure regarding "inter-picture" coding than the JP '083 does not take away from Applicants' assertion that JP '083 provides adequate support for the inputting of moving image data using intra-picture coding and inter-picture coding.

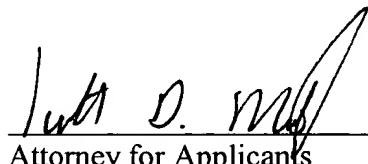
Independent Claims 92, 93 and 98 are also submitted to be supported for the same reasons discussed above with respect to Claim 87. As will be appreciated, these claims also recite performing intra-picture coding (as opposed to inter-picture coding) to the moving image data.

Accordingly, it is respectfully submitted that Bonomi should not qualify as prior art. Therefore, reconsideration and withdrawal of the rejections of the claims based on the Bonomi patent are respectfully requested.

In view of the foregoing, reconsideration and allowance of this application is deemed to be in order and such action is respectfully requested.

Applicants' undersigned attorney may be reached in our Washington, D.C. office by telephone at (202) 530-1010. All correspondence should continue to be directed to our below-listed address.

Respectfully submitted,



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